

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

GENESIS HEALTH CLUBS, INC.,)	
)	
Counter-Claim Defendant,)	
)	
vs.)	Case No.: 4:20-cv-01608
)	
KYNDALL P. STOKER,)	
)	
Counter-Claim Plaintiff.)	

**STIPULATION REGARDING KYNDALL STOKER’S
SUBMISSION OF COSTS, EXPENSES, AND ATTORNEY FEES**

Genesis Health Clubs, Inc. (“**GHC**”) and Kyndall Stoker (“**Stoker**”), by and through their respective attorneys, hereby stipulate as follows:

1. On January 11, 2021, this Court entered an order for remand to the state court, and also requested Stoker to submit documentation of the amounts reasonably incurred as a result of the removal. [Doc. No. 11].
2. On January 15, 2021, Stoker filed a submission of costs, expenses and attorney fees, seeking a total of **\$10,862.06** (the “Submission of Costs”) [Doc. No. 16].
3. On January 20, 2021, GHC filed an opposition to the Submission of Costs.
4. Undersigned counsel for all parties have conferred and agree to settle and resolve the issue of costs and expenses by stipulating to the amount of \$6,500.00, which the parties jointly request be the amount awarded to Kyndall Stoker reasonably incurred as a result of plaintiff’s removal.
5. Attached is a proposed order approving this stipulation.

Respectfully submitted,

POLSINELLI PC

By: /s/James P. Martin

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ATTORNEYS FOR GENESIS HEALTH CLUBS, INC.

-AND-

/s/Matthew P. O'Grady (by consent)

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ATTORNEY FOR KYNDALL P. STOKER

CERTIFICATE OF SERVICE

I hereby certify that on **January 25, 2021**, I filed the foregoing through the Court's electronic filing system, with notice to be generated and served to all parties of record. I further certify that I caused the foregoing to be served to following counsel via electronic mail:

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Counsel to Kyndall P. Stoker

/s/James P. Martin
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